

June 17, 2004

Edwin L. Mongan, III  
Manager, Environmental Stewardship  
Safety, Health & Environmental Excellence Center  
E. I. Du Pont de Nemours & Company  
1007 Market Street, DuPont 6082  
Wilmington, DE 19898

Dear Mr Mongan:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for the Triphenylboron category posted on the ChemRTK HPV Challenge Program Web site on February 19, 2004. I commend DuPont for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints except for biodegradation where testing following OECD TG 301 is recommended.
2. Health Effects. EPA agrees with the test plan for these endpoints.
3. Ecological Effects. EPA agrees with the test plan for these endpoints. However, if the hydrolysis rate determined in the proposed stability in water test is not sufficiently rapid, then a chronic daphnia test is recommended instead of the proposed acute toxicity fish test because the log Kow of triphenylborane is 5.52.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that DuPont advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber